

REMARKS

Claims remaining in the present Patent Application are Claims 1-6 and 13-24. Claims 7-12 are herein canceled. The Applicants respectfully request reconsideration of the above captioned patent application in view of the amendments presented herein and the following remarks.

U.S.C. § 102

Claims 1-5, 13-17 and 19-23 stand rejected under 35 U.S.C. § 102(e) as being allegedly unpatentable over Phillipps (WO 02/09362, "Phillipps"). Applicants have carefully reviewed the cited reference and respectfully assert that embodiments of the present invention as recited in Claims 1-5, 13-17 and 19-23 are patentable over Phillipps, in view of the following.

With respect to Claim 1, Applicants respectfully assert that Phillipps does not teach or fairly suggest the limitation of "wherein said establishing bypasses a Bluetooth discovery process" as recited by Claim 1.

The rejection argues that Phillipps page 4 lines 1-2 teach this limitation. Applicants respectfully traverse. The cited sentence reads,

[i]f the user knows the Bluetooth Device Addresses of the printer 11, the user can manually select the appropriate entry in the list 20 so that the device 1 can form a piconet with the printer 11.

Applicants find this cited passage to be silent as to the recited bypassing a Bluetooth discovery process, as recited by Claim 1. Applicants further find the entirety of Phillipps to be silent regarding the instant limitation. Applicants respectfully assert that the rejection applies impermissible hindsight to create a teaching not present in the cited reference, when viewed through the filter of the present claimed invention.

For this reason, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Moreover, with respect to Claim 1, the Phillipps reference is replete with references that teach conventional operation of a Bluetooth device, including, “[t]he transceiver is adapted for ... transmission and reception according to the Bluetooth specification” (page 3 lines 18-19), and “Bluetooth devices perform a discovery operation to locate other Bluetooth devices...” (page 3 lines 27-28, emphasis added). These teachings of Phillipps teach toward conventional operation of a Bluetooth device, and actually teach away from claimed embodiments in accordance with the present invention that recite bypassing a Bluetooth discovery process, as recited by Claim 1.

For this additional reason, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Still further with respect to Claim 1, the first portion of the paragraph cited by the rejection indicates that “list 20” is populated with “discovered Bluetooth devices” (page 3 lines 30-33, emphasis added). Applicants respectfully assert that the taught Bluetooth discovery directly teaches away from the recited limitation of bypassing a Bluetooth discovery process, as recited by Claim 1.

For this still further reason, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Claims 2-6 depend from Independent Claim 1. Applicants respectfully assert that these Claims overcome the rejections of record as they depend from and allowable base claim, and respectfully solicit allowance of these Claims.

In addition, with respect to Claim 3, Applicants respectfully assert that Phillipps fails to teach or fairly suggest the limitation, “said device

identification is entered by a user of said second hand held computer system” as recited by Claim 3.

The rejection argues that Phillipps page 3 line 34 – page 4 line 1 teach this limitation. Applicants respectfully traverse. The cited sentence reads (emphasis added),

[i]f the user knows the Bluetooth Device Addresses of the printer 11, the user can manually select the appropriate entry in the list 20 so that the device 1 can form a piconet with the printer 11.

Applicants understand this portion of Phillipps to teach selection of a Bluetooth Device Address from a list of Bluetooth Device Addresses. Applicants respectfully assert that “selection” from a list does not teach or fairly suggest entry of a Bluetooth device identification, as recited by Claim 3, as “entry” and “selection” are fundamentally different. For example, placing a call on a mobile phone is much different if the correct number is selected from a list, e.g., from an address book, than if entered manually, e.g., by depressing 7 to 10 digit keys.

The “Response to Arguments” section argues that “entry” is synonymous with “selection.” Applicants traverse. In order to “select” an object, such object must already be present in a group or list. “Entry” provides for introducing new information, e.g., information that is not already present in a group or list.

Thus, “entry” allows input of information that is not already present, and thus not selectable. The rejection gives no weight to the plain meaning of the term “entry,” and attempts to rewrite the recited claim to utilize a different term, with a different meaning, in order to improperly support the rejection’s cited art.

For this additional reason, Applicants respectfully assert that Claim 3 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

With respect to Claim 13, Applicants respectfully assert that Claim 13 overcomes the rejections of record for at least the rationale previously presented with respect to Claim 1, and respectfully solicit allowance of this Claim.

Claims 14-18 depend from Independent Claim 13. Applicants respectfully assert that these Claims overcome the rejections of record as they depend from and allowable base claim, and respectfully solicit allowance of these Claims.

With respect to Claim 19, Applicants respectfully assert that Claim 19 overcomes the rejections of record for at least the rationale previously presented with respect to Claim 1, and respectfully solicit allowance of this Claim.

Claims 20-24 depend from Independent Claim 19. Applicants respectfully assert that these Claims overcome the rejections of record as they depend from and allowable base claim, and respectfully solicit allowance of these Claims.

Claims 7-12 stand rejected under 35 U.S.C. § 102(e) as being allegedly unpatentable over Larsson (US 6,697,638, "Larsson"). Applicants respectfully assert that the cancellation of Claims 7-12 renders this rejection moot.

U.S.C. § 103

Claims 6, 18 and 24 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Phillipps (WO 02/09362, "Phillipps") and further in view of Johansson et al. (US 2002/0044549, "Johansson"). Applicants have carefully reviewed the cited reference and respectfully assert that embodiments of the present invention as recited in Claims 1-5, 13-17 and 19-23 are patentable over Phillipps and further in view of Johansson.

Applicants reiterate that Claims 6, 18 and 24 overcome the rejections of record by virtue of their dependency, and respectfully solicit allowance of these Claims.

With respect to Claims 6, Applicants respectfully assert that Phillipps and further in view of Johansson fails to teach or suggest the claimed limitation “responsive to a failure of (establishing a Bluetooth connection between said second hand held computer system and said first handheld computer system), beginning said Bluetooth discovery process” as recited by Claim 6. The rejection concedes Phillipps do not mention this element.

The rejection introduces Johansson to remedy this deficiency of Phillipps. The rejection asserts that Johansson teaches “(Bluetooth discovery process) should be invoked... periodically.” Applicants do not herein characterize Johansson. However, *arguendo*, assuming the rejection’s interpretation, Johansson’s teaching of “periodic” discovery, e.g., performing discovery responsive to a time interval, fails to teach or suggest the claimed limitation of performing discovery responsive to a failure to connect, as recited by Claim 6. Johansson teaches time as triggering discovery, while the instant limitation utilizes a failure to connect with a known device as a trigger. The two trigger events are fundamentally different, and “time” does not teach or suggest a failed connection attempt.

Thus, neither Phillipps nor Johansson, alone or in combination, teach or suggest this claimed limitation. Consequently, the rejection fails to establish

prima facie obviousness. For this reason, Applicants respectfully assert that Claim 6 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Applicants respectfully assert that Claims 18 and 24 overcome the rejections of record for at least the rationale previously presented with respect to Claim 6, and respectfully solicit allowance of these Claims.

CONCLUSION

Claims remaining in the present patent application are Claims 1-6 and 13-24. The Applicants respectfully request reconsideration of the above captioned patent application.

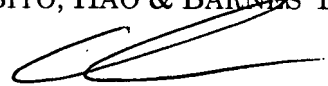
The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 504160.

Respectfully submitted,

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